

United States Department of the Interior



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TEMPORARY LAND CLOSURE TUSCARORA WILD HORSE GATHER ENVIRONMENTAL ASSESSMENT

DOI-BLM-NV-E020-2010-0027-EA

1 INTRODUCTION / PURPOSE OF AND NEED FOR ACTION

The Tuscarora Field Office, Bureau of Land Management (BLM) is proposing to limit public access through temporary closure of the public lands surrounding proposed gather and holding locations associated with the Tuscarora Wild Horse Gather within the Owyhee, Rock Creek and Little Humboldt herd management areas (HMAs) for the period of July 6 through July 31, 2010. This temporary closure would limit public use of these lands during wild horse gather operations.

The temporary closure would promote the safety and welfare of the wild horses and protect members of the public, as well as BLM and contractor personnel conducting gather operations. Increasing numbers of individuals have been traveling to the public lands during recent gathers in order to personally observe gather and handling operations. This increased level of interest and involvement can disrupt gather activities and poses potential safety hazards.

The wild horse gather operation scheduled to begin around July 9, 2010, includes the authorized use of helicopters to herd and capture wild horses from various portions of the Owyhee, Rock Creek, and Little Humboldt HMAs, as well as adjacent public and private lands outside of the established boundaries of the identified HMAs. The helicopters will also be assisted by BLM employees and contractors working on horseback or driving vehicles within the area. Gathered horses will be held temporarily at gather and holding facilities within the Owyhee, Rock Creek and Little Humboldt HMAs and adjacent public and private lands until approximately July 31, 2010.

Without this closure, the public could intentionally or inadvertently enter the lands in proximity to the gather and holding locations and endanger the wild horses, BLM and contractor personnel, as well as themselves. The proposed closure would only be temporary in duration, would be limited to the period of the gather operations, and would not affect all of the public lands within the HMAs simultaneously - only those areas where wild horses are being actively gathered and held. Areas temporarily closed to public access will be posted at main entry points into each closure area with signs as well as copies of this temporary closure notice.

This Environmental Assessment (EA) contains the site-specific analysis of potential impacts that could result with the implementation of the Proposed Action alternative for temporary closure or with the selection of the “no action” alternative. The EA ensures compliance with the National Environmental Policy Act (NEPA). Based on the following analysis of potential environmental consequences, a determination can be made whether to prepare an Environmental Impact Statement (EIS) or issue a “Finding of No Significant Impact” (FONSI). A FONSI documents why implementation of the selected alternative will not result in environmental impacts that significantly affect the quality of the human environment.

1.1 Relationship to Statutes, Regulations, and Other Plans

The BLM is responsible for the preparation of this EA, which was prepared in conformance with the policy guidance provided in the BLM’s NEPA Handbook (BLM Handbook H-1790-1).

The Proposed Action is consistent with all federal laws and regulations; other plans, programs, and policies of affiliated Tribes; other federal agencies, state, and local government, to the extent practical within federal law, regulation, and policy.

Authority for a temporary land closure is found at 43 CFR 8364.1.

2 ALTERNATIVES INCLUDING THE PROPOSED ACTION

2.1 Proposed Action

The proposed action is temporary closure of certain public lands to all public entry for those public lands located adjacent to and around the proposed gather and holding locations for the Tuscarora Wild Horse Gather. This temporary closure of the subject lands will be in effect on the Owyhee, Rock Creek and Little Humboldt Wild Horse Herd Management Areas in Elko County, Nevada from 12:01 A.M. PDT on Tuesday July 6, 2010 until Saturday July 31, 2010 at 11:59 P.M. PDT.

Temporary closure of the public lands would be announced by a Temporary Closure Notice published in the Federal Register. Public land users wishing to use the lands for various purposes would be affected by the temporary closure. In addition to publication in the Federal Register, the notice would be published in a local newspaper at least 7 days prior to the start of the temporary closure. Also, roads leading into the public lands under notice would be posted to notify the public of the closure. The closure notice would be posted on the BLM web site and the public room at the Nevada State Office and the Elko District Office.

The legal description of the affected public lands is:

Mount Diablo Meridian, Nevada

T. 45 N., R. 48 E,
sec. 11, 13-14,

sec. 24 N $\frac{1}{2}$ NW $\frac{1}{4}$, SW $\frac{1}{4}$ NW $\frac{1}{4}$, NE $\frac{1}{4}$, NE $\frac{1}{4}$ SE $\frac{1}{4}$, SW $\frac{1}{4}$ SE $\frac{1}{4}$, S $\frac{1}{2}$ SW $\frac{1}{4}$, and NW $\frac{1}{4}$ SW $\frac{1}{4}$;
sec. 25 NW $\frac{1}{4}$, E $\frac{1}{2}$ SE $\frac{1}{4}$, and SW $\frac{1}{4}$ SE $\frac{1}{4}$;
sec. 35 NW $\frac{1}{4}$, W $\frac{1}{2}$ NE $\frac{1}{4}$, NE $\frac{1}{4}$ NE $\frac{1}{4}$, W $\frac{1}{2}$ SE $\frac{1}{4}$, and SW $\frac{1}{4}$; and
sec. 36 SE $\frac{1}{4}$ NW $\frac{1}{4}$, E $\frac{1}{2}$ SW $\frac{1}{4}$, and E $\frac{1}{2}$.

T. 45 N., R. 49 E.,
sec. 19-20 and 29-32

T. 44 N., R. 48 E.,
sec. 2 W $\frac{1}{2}$, NW $\frac{1}{4}$ NE $\frac{1}{4}$, and E $\frac{1}{2}$ SE $\frac{1}{4}$,
sec. 11 W $\frac{1}{2}$, NE $\frac{1}{4}$ NE $\frac{1}{4}$, W $\frac{1}{2}$ SE $\frac{1}{4}$,
sec. 13,
sec. 14 NW $\frac{1}{4}$, W $\frac{1}{2}$ NE $\frac{1}{4}$, SE $\frac{1}{4}$ NE $\frac{1}{4}$, and S $\frac{1}{2}$,
sec. 24 W $\frac{1}{2}$, W $\frac{1}{2}$ NE $\frac{1}{4}$, NE $\frac{1}{4}$ NE $\frac{1}{4}$, and SE $\frac{1}{4}$.

T. 44 N., R. 49 E.,
sec. 19 SW $\frac{1}{4}$ SW $\frac{1}{4}$.

T. 43 N., R. 50 E.,
sec. 27-28,
sec. 29 NE $\frac{1}{4}$ Ne $\frac{1}{4}$, S $\frac{1}{2}$ NE $\frac{1}{4}$, N $\frac{1}{2}$ SE $\frac{1}{4}$, and SE $\frac{1}{4}$ SE $\frac{1}{4}$.
sec. 30-31,
sec. 32 E $\frac{1}{2}$ NE $\frac{1}{4}$ and E $\frac{1}{2}$ SE $\frac{1}{4}$,
sec.33-34.

T. 42 N., R. 50 E.,
sec. 3-4,
sec. 5 E $\frac{1}{2}$ NE $\frac{1}{4}$, E $\frac{1}{2}$ SE $\frac{1}{4}$, and SW $\frac{1}{4}$ SE $\frac{1}{4}$,
sec. 6 NW $\frac{1}{4}$ and NW $\frac{1}{4}$ NE $\frac{1}{4}$,
sec. 19 SE $\frac{1}{4}$ NW $\frac{1}{4}$, E $\frac{1}{2}$, NE $\frac{1}{4}$ SW $\frac{1}{4}$, and S $\frac{1}{2}$ SW $\frac{1}{4}$,
sec. 20 E $\frac{1}{2}$,
sec. 29 SE $\frac{1}{4}$ NW $\frac{1}{4}$, NE $\frac{1}{4}$, NE $\frac{1}{4}$ SE $\frac{1}{4}$, S $\frac{1}{2}$ SW $\frac{1}{4}$, and NW $\frac{1}{4}$ SW $\frac{1}{4}$.

T. 42 N., R. 49 E.,
sec. 33 NW $\frac{1}{4}$, NW $\frac{1}{4}$ NE $\frac{1}{4}$, E $\frac{1}{2}$ SE $\frac{1}{4}$, W $\frac{1}{2}$ SW $\frac{1}{4}$, and NE $\frac{1}{4}$ SW $\frac{1}{4}$.

T. 41 N., R. 49 E.,
sec. 4 NW $\frac{1}{4}$ NW $\frac{1}{4}$, NW $\frac{1}{4}$ NE $\frac{1}{4}$, S $\frac{1}{2}$ NE $\frac{1}{4}$, and SE $\frac{1}{4}$,
sec. 9 NE $\frac{1}{4}$ and E $\frac{1}{2}$ SE $\frac{1}{4}$.

T. 41 N., R. 48 E.,
sec. 6-7 and 18.

T. 41 N., R. 47 E.,
sec. 1 and 12-13.

T. 40 N., R. 48 E.,
sec. 27 N½ and SE¼,
sec. 28 W½,
sec. 29 SW¼NW¼, NE¼NW¼, NE¼, N½SE¼, SE¼SE¼, S½SW¼, and NW¼SW¼,
sec. 32 N½NW¼, S½SE¼, and SE¼SW¼.

Not all subject lands will be closed during the entire period; the public will be authorized to use those areas where gather operations are either not in progress or have been finalized. Areas from which the public will be temporarily excluded will be limited to the public lands surrounding the gather and temporary holding areas. Under the proposed action, public access to the areas where active gather and holding operations are taking place will be limited to specifically scheduled and escorted public and media visitation days when the public will be allowed to view the gather operations as well as the horses being temporarily held during the gather.

To allow for greater transparency and in order to provide opportunities to educate the public about the BLM's wild horse and burro gathers, observation days have been created to allow visitors to attend the gathers. Once the visitation days have been scheduled, members of the public who have expressed an interest in attending the gather activities will be able sign up for specific days offered on a first-come, first-served basis. Before attending the gather, visitors will be asked to read and sign a set of visitor observation ground rules and a waiver of liability (see Appendix 1). While visiting the gather location, all visitors will be required to stay within a designated observation area that will be clearly identified at each location. At the temporary holding facility(s), visitors will be escorted around the facility so that they can observe the wild horses in the various holding pens as well as view the sorting activities from designated observation site. These rules were created to ensure the safety of both the humans and the animals at the gather and temporary holding site(s). Any visitors who do not follow the rules of observation will be removed from the gather and will not be allowed to attend future gathers.

2.2 No Action Alternative

Under the No Action Alternative, no temporary closure order would be issued and the lands would remain open to public entry during all of the gather and holding operations.

3 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

3.1 Introduction

This chapter identifies and describes the current condition and trend of elements or resources in the human environment which may be affected by the Proposed Action or alternatives.

3.2 Scoping and Issue Identification

Through internal scoping, the BLM determined that no additional issues, impacts, or potential alternatives need to be addressed in this EA since the Proposed Action consists solely of temporary closure to the public of the affected public lands.

3.3 Supplemental Authorities and Other Resources

Appendix 1 of BLM's NEPA Handbook (H-1790-1) identifies Supplemental Authorities that are subject to requirements specified by statute or executive order and must be considered in all BLM environmental documents. The table below lists the Supplemental Authorities and their status in the in the location of the proposed action. Supplemental Authorities that may be affected by the Proposed Action are further described in this EA.

Table 3.3-1: Supplemental Authorities Considered in the EA

Supplemental Authority	Not Present	Present/Not Affected	Present/May Be Affected	Rationale/Reference Section
Air Quality		X		The Proposed Action would have no effect.
Areas of Critical Environmental Concern (ACECs)	X			Resource is not present.
Cultural Resources		X		The Proposed Action would have no effect.
Environmental Justice	X			Resource is not present.
Flood Plains		X		The Proposed Action would have no effect.
Forests and Rangelands (See Vegetation Section)		X		The Proposed Action would have no effect.
Invasive, Nonnative Species		X		The Proposed Action would have no effect.
Migratory Birds		X		The Proposed Action would have no effect.
Native American Concerns		X		The Proposed Action would have no effect.
Prime or Unique Farmlands	X			Resource is not present.
Threatened or Endangered Species (plants and animals)		X		The Proposed Action would have no effect.
Wastes, Hazardous and Solid	X			Resource is not present
Water Quality (Surface-Ground)		X		The Proposed Action would have no effect.
Wetlands and Riparian Zones		X		The Proposed Action would have no effect.
Wild and Scenic Rivers		X		The Proposed Action would have no effect.
Wilderness		X		The Proposed Action would have no effect.

The following resources or uses, which are not Supplemental Authorities as defined by BLM's Handbook H-1790-1, are present in the area (Table 3.3-2). Resources or uses that may be affected by the Proposed Action are further described in this EA. Resources or uses that are either not present or are present and not affected will not be further discussed in the EA.

Table 3.3-2: Other Resources Considered in the EA

Resources or Uses	Not Present	Present/Not Affected	Present/May Be Affected	Rationale/Reference Section
Range Resources		X		The Proposed Action would have no effect.
Land Use		X		The Proposed Action would have no effect.
Soils		X		The Proposed Action would have no effect.
Vegetation		X		The Proposed Action would have no effect.
Visual Resources		X		The Proposed Action would have no effect.
Wildlife		X		The Proposed Action would have no effect.
Wild Horses			X	Brought forward for analysis.
Recreation			X	Brought forward for analysis.
Other			X	Public Health and Safety

3.4 Resources or Uses Present And Brought Forward For Analysis (All Resources)

3.4.1 Wild Horses

Affected Environment

Gather Operations

The BLM has been actively conducting wild horse gathers for almost 40 years. During this time, methods and procedures have been identified and refined throughout the western states to minimize stress and impacts to wild horses during implementation of wild horse gathers. Each gather is conducted using a set of Standard Operating Procedures (SOPs) which have been implemented to ensure a safe and humane gather and to minimize potential stress and injury to wild horses.

The conduct the gather, the BLM or contractor utilizes a helicopter and pilot to herd the horses or burros to the gather location. The use of a helicopter drive-trapping is well established for the management of wild horses and burros as well as various wildlife species and is humane, safe and effective. The pilot locates groups of wild horses and burros within the HMA and guides them towards the gather corrals. The pilot and the BLM staff monitor the condition of the horses and burros to ensure their safety by checking for signs of stress, exhaustion, and injuries.

Once near the gather site, the contractor holds a “Prada” horse at the mouth of the wings leading to the gather corral. As the pilot herds the wild horses and burros into the wings, the Prada horse is released and leads all of the wild horses into the gather corrals, which reduces the chances for the wild horses to try to jump out of the corral or strike the panels once inside. The contractor’s ground crew secure gates once the horses and burros are within the corrals. Once gates are secure, the crew separates the foals and weaker horses from the other horses at the gather site so that they may be transported to the holding corrals separately and avoid being injured by the stronger animals.

Occasionally (and more frequently for difficult to gather areas) helicopter-assisted roping is implemented, in which the pilot moves a small group of horses or burros to the gather area, and the crewmembers rope the animals by horseback. This method often prevents overstressing the wild horses and burros from repeated attempts to move them into the gather corrals. The roped

horses are then led to the corrals, to awaiting stock trailers, or carefully immobilized on the ground until they can be loaded into stock trailers.

Temporary Holding

The gather contractor constructs a centrally located temporary holding facility to which the wild horses or burros are transported after being gathered. These corrals consist of six or more pens constructed of sturdy panels, with a central alleyway and working/squeeze chute in the center. Once horses and burros are in the holding corrals, the BLM staff and the contractor age and sort the animals into appropriate pens, separating mares and foals from studs to prevent fighting and injury as well as identifying excess animals to be shipped to adoption preparation facilities and animals to be retained within the HMA. During the aging and sorting process, the BLM staff documents age, color, body condition and lactation status of the horse. Injuries are noted and treated if needed. During this time, the BLM may consult with a veterinarian to treat sick or injured animals, or make recommendations for euthanasia. Once sorted, the wild horses and burros are given hay and unlimited water.

Generally, wild horses and burros settle down quickly once gathered, sorted and placed into the holding pens. They appear to have a heightened level of stress due to the helicopter activities and a heightened awareness of people moving around them but this subsides as the animals become accustomed to the activities. At all times, extreme caution is used when moving around the holding corrals so as not to cause undue stress to the horses or to scare/spook them where they could potentially injure themselves by striking panels. Corral panels are covered with snow fencing to keep animals calm by limiting their vision of the surroundings. To reduce the stress level when moving wild horses and burros within the corrals for sorting and loading purposes, the contractor uses as few people as possible to safely complete the activity.

Environmental Consequences

Proposed Action

The proposed temporary closure would eliminate potential stress and injury to the wild horses that could result from wild horses or burros trying to shy away or flee from individuals or groups of people who may get in the path of the herding, who may approach them at holding facilities, who may enter (or attempt to enter) the gather and holding corrals without authorization, or who create a disturbance such as attempting to release the animals from holding and gather corrals.

No Action

Without implementing the proposed temporary closure, there would be potential for increased stress and injury to the wild horses resulting from individuals or groups of people purposely or inadvertently crossing or blocking the path of the horses being herded to gather corrals. The helicopter pilots try to guide or herd the horses and burros in the direction of the gather locations at their own pace and along routes that they normally travel so the animals will move in the desired direction without much pressure. However, if something or someone suddenly blocks or crosses this path, they will try to flee away from whatever it is, undermining the more measured pace of the helicopter pilots. This can result in higher levels of stress and possible exhaustion and injury due to the increased herding pressure in order to get them to the gather location. Fleeing horses can go through wire fences, traverse unstable terrain, and go through areas that they

normally don't travel in order to get away from whatever scared them or caused them to flee which all can lead to possible injury and stress.

Once inside the gather corral and later when the wild horses or burros are trying to acclimate to the temporary holding corral and its associated activities, they will try to flee or shy away from any unknown disturbance in and around the corral. These disturbances can be people coming into the corral, trying to move the horses, climbing on the corral panels, making loud noises, sudden movements on the outside of the corral and vehicle activities. The response to these disturbances can vary from simply moving away to kicking or striking out as well as trying to jump out of the pen. In attempting to flee or jump, potential injury to the horse can be minor cuts and bruises, lameness, fractures limbs, and possibly death. These disturbances also increase the level of stress experienced by the horses, which contractor personnel seek to minimize through their standard operating procedures.

3.4.2 Public, BLM, and Contractor Safety

Affected Environment

In recent gathers, members of the public have increasingly traveled to the public lands to observe BLM's gather operations. While many members of the public cause no problems as a result of their presence and follow BLM's directions during the gathers, a few members of the public have actively taken or attempted to take actions to obstruct or interfere with the wild horse gather operations. For example, during recent past gathers such individuals have blocked or attempted to block roads used by BLM and its contractors, have driven into unauthorized areas, or have attempted to enter into the pens where wild horses are being held following the gather. Members of the public can also inadvertently wander into areas that put them in the path of wild horses that are being herded or handled during the gather operations. Such activities, whether intentional or accidental, not only hamper the gather operations, but more importantly, create the potential for injury to the wild horses or burros and to the BLM employees and contractors conducting the gather and/or handling the horses as well as to the public themselves. Because these horses are wild animals, there is always the potential for injury when individuals get too close or inadvertently get in the way of gather activities.

The helicopter work is done at various heights above the ground, from as little as several feet (when herding the animals the last short distance to the gather corral) to several hundred feet (when doing a recon of the area). While helicopters are highly maneuverable and the pilots are very skilled in their operation, unknown and unexpected obstacles in their path can impact their ability to react, creating an extreme safety concern. These same unknown and unexpected obstacles can impact the wild horses or burros being herded by the helicopter in that they may not be able to react and can be potentially harmed or caused to flee which can lead to injury and additional stress. When the helicopter is working close to the ground, the rotor wash of the helicopter is a safety concern by potentially causing loose vegetation, dirt, and other objects to fly through the air which can strike or land on anyone in close proximity as well as cause decrease vision.

Environmental Consequences

Proposed Action

The proposed temporary closure would protect members of the public from dangers caused by low-flying aircraft and wild horse herding and handling. In addition to reducing the potential for injury to the public, the proposed temporary closure would also protect the safety of BLM employees and contractors.

No Action

Public safety could be jeopardized if the lands are not closed to public entry during the gather operations. Without implementing the temporary closure, there would be increased potential for injury to BLM staff and contractors, as well as members of the public. Wild horses or burros will try to flee if they perceive that something or someone suddenly blocks or crosses their path. Fleeing horses can go through wire fences, traverse unstable terrain, and go through areas that they normally don't travel in order to get away, all of which can lead them to injure people by striking or trampling them.

Disturbances in and around the gather and holding corral have the potential to injure the government and contractor staff who are trying to sort, move and care for the horses and burros by causing them to be kicked, struck, and possibly trampled by the animals trying to flee. Such disturbances also have the potential for similar harm to the public themselves.

3.4.3 Recreation

Affected Environment

Recreation in the vicinity of the Owyhee Gather operations is mostly dispersed and of a motorized nature. Activities include wildlife viewing, bird watching, recreational OHV driving or sightseeing/exploring, recreational shooting, and some fishing and camping, usually near water sources. Most visits occur on weekends. Some river floating does occur in July but in normal years the flow is very low so most of the use is downstream near the Pipeline crossing into Idaho. Access for most river floaters this time of year is from the town of Owyhee, west to the Pipeline Crossing put in.

Environmental Consequences

Proposed Action

Temporary closure would interfere with recreational activities that public may want to undertake within the closure area. The temporary closures for up to approximately 21 days in the vicinity of the Owyhee Gather operations will temporarily displace recreationists (except for those floating the Owyhee River, where access will be open). However due to the vastness of the area and dispersed nature of most recreation, there are many other alternative access routes and open areas that the public could recreate in. It is estimated based on institutional knowledge of BLM staff, that approximately 20 recreationists during the 21 day closure period may be temporarily displaced.

The temporary closure would also reduce the potential risk of injury to recreationists, for the reasons identified above in the section on Public, BLM, and Contractor Safety.

No Action

Without implementation of the temporary closure, there would be no interference with recreational activities. But recreationists could potentially be injured, for the reasons identified in the section above on Public, BLM, and Contractor Safety.

4 CUMULATIVE IMPACTS

A cumulative impact is defined under federal regulations as follows:

"...the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time" (40 CFR 1508.7).

All resource values have been evaluated for cumulative impacts. It has been determined that cumulative impacts would be negligible as a result of the proposed action since the closure is of a short duration and would not authorize any surface disturbing activities.

5 CONSULTATION AND PUBLIC INPUT

5.1 List of Preparers

Bureau of Land Management

Alan Shepherd

5.2 Persons, Groups and Agencies Contacted

Elko County Commissioners
Elko County Sheriff's Department

Appendix 1

Visitor Observation Protocol and Ground Rules

Before participating in a scheduled gather visit day, observers must read the protocol and rules below and agree to comply with such rules. Any observer who does not follow the rules may be required to leave the gather site. These rules were created to ensure the safety of both the humans and the animals at the gather site(s).

- Observers must provide their own 4-wheel drive vehicle, appropriate shoes, clothing, and food.
- Observers are prohibited from riding in government and contractor vehicles and equipment.
- Anyone arriving at the rendezvous site without an appointment will not be allowed to participate in the observation day.
- BLM representatives will escort observers to and from the gather and/or temporary holding facility.
- Observers will be assigned to a specific BLM representative and must stay with that person at all times. Observers are **NOT** permitted to walk around the gather and/or temporary holding site unaccompanied by their BLM representative.
- The BLM will identify observation areas. Observers **must** stay within these areas and not stray into closed areas of the public lands.
- Observers are prohibited from interfering with the gather by, among other things, climbing/trespassing onto or in the trucks, equipment, or corrals of the BLM or BLM contractor.
- Observers must direct their questions/comments to either their designated BLM representative or the BLM spokesperson on site, and not engage other BLM/contractor staff or disrupt their gather duties/responsibilities.
- BLM may make the BLM/contractor staff available during down times for a Q&A session.
- When given the signal that the helicopter is close to the gather site bringing horses in, visitors must sit down in areas specified by BLM representatives and must not move, talk, or otherwise cause a disruption as the horses are guided into the corral.

- Observers are prohibited from causing a public disturbance or creating a risk to other persons on the public lands by, among other things, making unreasonable noise; creating a hazard or nuisance; refusing to disperse, when directed to do so by an authorized officer; interfering with any BLM employee, contractor, or volunteer engaged in the performance of official duties; resisting arrest or issuance of citation by an authorized officer engaged in the performance of official duties; or assaulting, committing battery upon, or knowingly giving any false or fraudulent report of an emergency situation or crime to any BLM employee, contractor, or volunteer engaged in the performance of official duties.
- Observers must sign a liability waiver form acknowledging the potential risks associated with their participation in the scheduled public observation day.

BLM retains the discretion to escort individuals off the gather and/or holding site at any time. In addition, any individuals who do not cooperate and follow the rules may be escorted off the gather and/or holding site by BLM law enforcement personnel.